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# UGELL LAW FIRM, P.C.

ATTORNEYS AND COUNSELORS AT LAW

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- CRIMINAL DEFENSE • CONSUMER BANKRUPTCY • REAL ESTATE • FORECLOSURE DEFENSE •
  - LOAN MODIFICATION • MATRIMONIAL & FAMILY LAW • WILLS & ESTATES •
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**SCOTT B. UGELL, ESQ.**  
SCOTT@UGELLLAW.COM  
EXTENSION: 101

151 N. MAIN STREET, STE #202  
NEW CITY, NEW YORK 1056  
WWW.UGELLLAW.COM  
OFFICE: (845) 639-7011  
FAX: (845) 639-7004

**PAUL S. COOPER, ESQ.**  
PAUL@UGELLLAW.COM  
EXTENSION: 102

ADMITTED IN:  
NY, FEDERAL, AND U.S. SUPREME

ADMITTED IN:  
NY AND FEDERAL COURT

September 24, 2018

VIA ECF & Email

Hon. Robert D. Drain  
US Bankruptcy Court  
Southern District of New York  
300 Quarropas Street,  
White Plains, NY 10601  
Email: [rdd.chambers@nysb.uscourts.gov](mailto:rdd.chambers@nysb.uscourts.gov)

Re: Hershy Itzkowitz – Chapter 13 Case #18-23342  
Request for Adjournment of 9/26/2018 Hearing - Motion for In Rem Relief From the Automatic Stay

Dear Judge Drain:

I am respectfully requesting an adjournment of this matter to allow me time to confer with my client in order to respond to movant's motion for which a hearing is scheduled before Your Honor on September 26.

I filed a Notice of Appearance in this matter on September 17, 2018, and due to that fact, opposing counsel graciously agreed to extend my time to respond until September 25, 2018, and Your Honor so ordered same on September 21, 2018.

My client is devoutly religious. When I requested of opposing counsel that the time to respond be extended to September 25, I was unfortunately unaware that the 24<sup>th</sup> and 25<sup>th</sup> of September were part of the Sukkot holiday. As a devout person, my client is unable to participate in the formulation of our response at all on September 24, and not until after sundown on September 25<sup>th</sup>. Due to Yom Kippur observance and other scheduling issues, I was not made aware of this problem until late in the afternoon of September 21.

I know that opposing counsel does not want to adjourn the hearing on the matter, but due to this religious schedule conflict, I humbly request an adjournment for enough time to formulate a proper response with my client's input, and subsequently for opposing to have time to make his response.

Thank you.

Very truly yours,



Scott B. Ugell, Esq.  
SBU/cg

cc: Jeremy S. Sussman, Esq.  
Krista M. Preuss, Trustee